

Honorable Shelley C. Chapman  
United States Bankruptcy Judge  
One Bowling Green  
**Courtroom: 623**  
New York, NY 10004-1408

RE:  
Chapter 11

Case No 98-13555(SCC)

**MOTION TO CHANGE VENUE/TRANSFER CASE  
MOTION TO DISMISS/STATUTE OF LIMITATIONS  
Memorandum**

October 10, 2016

Dear Honorable Judge Chapman,



With this writing I am enclosing two Motions To Withdraw, Motions previously submitted to the court.

- Motions to Withdraw 1) Motion to Dismiss Statute of Limitations  
without prejudice  
2) Motion to Dismiss Transfer of Venue  
without prejudice**

**Background**

Pursuant to the attached letter from Nicole Kim, ADR Counsel, titled:  
**Withdrawal of Demand For Payment-Las Olas Mortgage Center, Inc.**

Upon filing of the original Motions 1) and 2) above Lehman Brothers Holdings, Inc. through their counsel Nicole Kim sent a letter withdrawing their demand for payment. (Letters attached to Motions to Withdraw).

Las Olas Mortgage Center, Inc. (LOMCI) requested of Lehman Brothers Holdings, Inc. in LOMCI's Statement of Position, LOMCI be made whole, by withdrawing LBHI Demand for Payment, this letter satisfies that request. Therefore this motion to withdraw previous motions is requested of your Honor.

LOMCI thanks the court for their considerations and prompt response by Greg White.

  
Sincerely

Donald P. Arney and  
Elizabeth F. Arney

C: Nicole Kim (RRR)  
ADR Counsel  
Lehman Brothers Holdings, Inc.  
7807 Peakview Avenue  
Suite 410  
Centennial, Co 80111

Donald Arney  
Elizabeth Arney  
2958 Burnett Terrace  
The Villages, Fl 3216  
[donaldarney@gmail.com](mailto:donaldarney@gmail.com)  
954-868-3875

**LEHMAN BROTHERS HOLDINGS INC.**

October 7, 2016

**VIA UPS Delivery**

Donald Arney  
2958 Burnett Terrace  
The Villages, FL 32163

Re: **Withdrawal of Demand For Payment - Las Olas Mortgage Center Inc.**

Dear Mr. Arney,

The Bankruptcy Estate of Lehman Brothers Holdings Inc. ("LBHI") sent a Demand for Payment dated September 9, 2016 to you as owner of Las Olas Mortgage Center Inc. This letter is to inform you that LBHI is formally withdrawing the Demand for Payment and the alleged underwriting breaches outlined therein. Accordingly, please confirm that you will also be withdrawing the two motions filed in the United States Bankruptcy Court, Southern District of New York, In Re Lehman Brothers Holdings Inc., Case No. 98-13555: Motion for Change of Venue/Transfer of Case and Motion for Dismissal Statute of Limitations. Please forward the confirmation of the withdrawal of the motions referenced above to my attention.

Very truly yours,



Nicole Kim  
ADR Counsel  
Lehman Brothers Holdings, Inc.  
Direct: (720) 945-3217  
Nicole.Kim@lehmanholdings.com

**LEHMAN BROTHERS HOLDINGS INC.**

October 7, 2016

**VIA UPS Delivery**

Elizabeth Arney  
2958 Burnett Terrace  
The Villages, FL 32163

Re: **Withdrawal of Demand For Payment Las Olas Mortgage Center Inc.**

Dear Ms. Arney,

The Bankruptcy Estate of Lehman Brothers Holdings Inc. ("LBHI") sent a Demand for Payment dated September 9, 2016 to you as owner of Las Olas Mortgage Center Inc. This letter is to inform you that LBHI is formally withdrawing the Demand for Payment and the alleged underwriting breaches outlined therein. Accordingly, please confirm that you will also be withdrawing the two motions filed in the United States Bankruptcy Court, Southern District of New York, In Re Lehman Brothers Holdings Inc., Case No. 98-13555: Motion for Change of Venue/Transfer of Case and Motion for Dismissal Statute of Limitations. Please forward the confirmation of the withdrawal of the motions referenced above to my attention.

Very truly yours,



Nicole Kim  
ADR Counsel  
Lehman Brothers Holdings, Inc.  
Direct: (720) 945-3217  
Nicole.Kim@lehmanholdings.com